

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

- - -

IN RE: TERRORIST ATTACKS : 03-MDL-1570
ON SEPTEMBER 11, 2001 : (GBD) (SN)

- - -

APRIL 6, 2021
THIS TRANSCRIPT CONTAINS
CONFIDENTIAL MATERIAL

- - -

Remote Videotaped
Deposition, taken via Zoom, of CHAS W.
FREEMAN, JR., commencing at 9:08 a.m., on
the above date, before Amanda
Maslynsky-Miller, Certified Realtime
Reporter and Notary Public in and for the
Commonwealth of Pennsylvania.

- - -

GOLKOW LITIGATION SERVICES
877.370.3377 ph| 917.591.5672 fax
deps@golkow.com

1 APPEARANCES:

2

3

4 KREINDLER & KREINDLER LLP
BY: ANDREW J. MALONEY III, ESQUIRE
750 Third Avenue
5 New York, New York 10017
(212) 687-8181
6 amaloney@kreindler.com
Representing the Ashton, et al.,
7 Plaintiffs
8
9

10 COZEN O'CONNOR P.C.
BY: SEAN P. CARTER, ESQUIRE
One Liberty Place
11 1650 Market Street
Suite 2800
12 Philadelphia, Pennsylvania 19103
(215) 665-2000
13 scarter1@cozen.com
Representing the Plaintiffs
14
15

16 MOTLEY RICE LLC
BY: ROBERT T. HAEFELE, ESQUIRE
17 BY: C. ROSS HEYL, ESQUIRE
28 Bridgeside Boulevard
18 Mount Pleasant, South Carolina 29464
(843) 216-9000
19 rhaefeles@motleyrice.com
rheyl@motleyrice.com
20 Representing the Plaintiffs' Steering
Committee and the Burnett Plaintiffs
21
22
23
24

1 APPEARANCES: (Continued)

2

3

ANDERSON KILL P.C.

BY: JERRY S. GOLDMAN, ESQUIRE

4

1251 Avenue of the Americas

New York, New York 10020

5

(212) 278-1000

jgoldman@andersonkill.com

6

Representing the Plaintiffs'

Steering Committee

7

8

9

JONES DAY

BY: ERIC SNYDER, ESQUIRE

10

BY: GABRIELLE PRITSKER, ESQUIRE

250 Vesey Street,

11

New York, New York 10281-1047

(212) 755-3435

12

esnyder@jonesday.com

gpriksker@jonesday.com

13

Representing the Defendant,

Dubai Islamic Bank

14

15

16

LAW FIRM OF OMAR T. MOHAMMEDI, LLC

BY: OMAR T. MOHAMMEDI, ESQUIRE

17

BY: JOSHUA MORRISON, ESQUIRE

BY: JILL L. MANDELL, ESQUIRE

18

233 Broadway

Suite 820

19

New York, New York 10279

(212) 725-3846

20

omohammed@otmlaw.com

jmorrison@otmlaw.com

21

jmandell@otmlaw.com

Representing the Defendant,

22

WAMY and WAMY International

23

24

1 APPEARANCES: (Continued)

2

3

GOETZ & ECKLAND P.A.

BY: FREDERICK J. GOETZ, ESQUIRE

4

615 1st Avenue NE

Suite 425

5

Minneapolis, Minnesota 55413

(612) 874-1552

6

fgoetz@goetzeckland.com

Representing the Defendant,

7

WAMY and WAMY International

8

9

LEWIS BAACH KAUFMANN MIDDLEMISS PLLC

10

BY: SUMAYYA KHATIB, ESQUIRE

1101 New York Avenue, N.W.

11

Suite 1000

Washington, D.C. 20005

12

(202) 833-8900

sumayya.khatib@lbkmlaw.com

13

- and -

14

BY: AISHA E.R. BEMBRY, ESQUIRE

15

BY: WALEED NASSAR, ESQUIRE

BY: NOUR SUBANI, ESQUIRE

16

1101 New York Avenue, NW

Suite 1000

17

Washington, D.C. 20005

(202) 833-8900

18

aisha.bembry@lbkmlaw.com

waleed.nassar@lbkmlaw.com

19

nour.subani@lbkmlaw.com

Representing the Defendants,

20

Muslim World League, the

International Islamic Relief

21

Organization, and

Drs. Turki, Al-Obaid, Naseef and Basha

22

23

24

1 APPEARANCES: (Continued)

2

3

4 BERNABEI & KABAT, PLLC
BY: ALAN KABAT, ESQUIRE
1400 16th Street NW
5 Suite 500
Washington, D.C. 20036
6 (202) 745-1942
kabat@bernabeipllc.com
7 Representing the Defendants,
Dr. Abdullah al Turki, Dr. Abdullah
8 Al Obais, Dr. Abdullah Naseef, and
Dr. Adnan Basha

9

10

11

12 SALERNO & ROTHSTEIN
BY: PETER C. SALERNO, ESQUIRE
BY: AMY ROTHSTEIN, ESQUIRE
13 221 Schultz Hill Road
Pine Plains, New York 12567
14 (518) 771-3050
peter.salerno.law@gmail.com
15 amyrothsteinlaw@gmail.com
Representing the Defendant,
16 Yassin Kadi

17

18 ALSO PRESENT:

19 David Lane, Videographer
Jon Knowles, Trial Technician

20

21 John Fawcett, Staff, Kreindler & Kreindler

22

Raymond Rivera, IT, Cozen O'Connor

23

Bachar Al-Halabi, Interpreter

24 Ed Beetar, Check Interpreter

Marwan Abdel-Rahman, Interpreter

1	- - -	
2	I N D E X	
3	- - -	
4		
	Testimony of: CHAS W. FREEMAN, JR.	
5		
6	By Mr. Haefele	12, 408, 486
	By Mr. Maloney	352, 500
7	By Mr. Nassar	422
	By Mr. Goetz	448
8		
9	- - -	
10	E X H I B I T S	
11	- - -	
12		
	NO. DESCRIPTION PAGE	
13		
	Freeman-535 No Bates	
14	Notice of Oral Deposition	
	of Chas W. Freeman, Jr.	14
15		
	Freeman-536 Expert Report	
16	Saudi Arabia's Society and	
	Government, Chas	
17	Freeman, Jr.	28
18	Freeman-537 No Bates	
	Curriculum Vitae, Chas W.	
19	Freeman, Jr.	36
20	Freeman-538 No Bates	
	Memorandum for the Record	74
21		
	Freeman-539 No Bates	
22	Audio Clip	103
23	Freeman-540 No Bates	
	NPR Interview, Freeman	
24	Explains His Intelligence	

1	-	-	-
2	E	X	H
3	I	B	I
4	T	S	
	NO.	DESCRIPTION	PAGE
5	Freeman-541	MEPC006533-6534	
6		Donations Record	115
7	Freeman-542	MEPC006500-6508	
8		Donations 1990	123
9	Freeman-543	MEPC006494-6499	
10		Donations 1991	124
11	Freeman-544	MEPC005534	
12		5/11/00 Letter	128
13	Freeman-545	MEPC000637	
14		6/25/07 E-mail	134
15	Freeman-546	HRH Prince Alwaleed bin	
16		Talal Receives Former US	
17		Ambassador Chas Freeman to	
18		Discuss ME Social Issues	148
19	Freeman-547	No Bates	
20		Chas Freeman Slams "Israel	
21		Lobby"	190
22	Freeman-548	No Bates	
23		3/9/09 Letter	194
24	Freeman-549	MEPC006555-6558	
		1997 Contributions	210
	Freeman-550	No Bates	
		Obama's National	
		Intelligence Crackpot	224
	Freeman-551	No Bates	
		It's Official: Saudi Puppet	
		to Head NIC	229

1		- - -	
2		E X H I B I T S	
3		- - -	
4			
5	NO.	DESCRIPTION	PAGE
6	Freeman-552	No Bates 1/23/04 State Department Briefing	248
7	Freeman-553	No Bates Video Clip	274
8	Freeman-554	No Bates A Brief Reading List	290
9	Freeman-555	No Bates 3/4/21 Letter	312
10	Freeman-556	No Bates Invoices	313
11	Freeman-557	MEPC003780-3782 1/24/05 E-mail	346
12	Freeman-558	No Bates Saudi Arabia's Foreign and Domestic Dilemmas	348
13	Freeman-559	No Bates Harper: Saudi Third Man Revealed	388
14	Freeman-560	No Bates Clarification of the Truth in Light of Terrorism Hijackings & Suicide Bombings	405
15	Freeman-561	No Bates Milli Chronicle Article	452
16			
17			
18			
19			
20			
21			
22			
23			
24			

1		- - -	
2		E X H I B I T S	
3		- - -	
4			
5	NO.	DESCRIPTION	PAGE
6	Freeman-562	No Bates Withdrawal of Charles Freeman Is a Loss to the Country	465
7	Freeman-563	No Bates Nominee Ends Bid for Key Job in Intelligence	469
8	Freeman-564	No Bates Foreign Ties of Nominee Questioned	473
9	Freeman-565	No Bates Israel Stance Was Undoing of Nominee for Intelligence Post	473
10	Freeman-566	No Bates Rights Advocates Oppose Freeman	476
11	Freeman-567	No Bates Freeman's Fight	479
12	Freeman-568	No Bates Chas Freeman Redux: "When Idiots Attack"	479
13	Freeman-569	MEPC004611-4613 2/26/98 Fax	487
14	Freeman-570	MEPC004610 Binladin File	490
15			
16			
17			
18			
19			
20			
21			
22			
23			
24			

1 - - -

2 DEPOSITION SUPPORT INDEX

3 - - -

4 Direction to Witness Not to Answer

5 Page Line Page Line Page Line

6 420 14

7

8

9 Stipulations

10 Page Line Page Line Page Line

11 11 1

12

13

14 Question Marked

15 Page Line Page Line Page Line

16 None

17

18 Request for Production

19 Page Line Page Line Page Line

20

21

22

23

24

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24

- - -

(It is hereby stipulated and agreed by and among counsel that sealing, filing and certification are waived; and that all objections, except as to the form of the question, will be reserved until the time of trial.)

- - -

VIDEO TECHNICIAN: We are now on the record. My name is David Lane, videographer for Golkow Litigation Services. Today's date is April 6th, 2021. The time is 9:08 a.m. Eastern Standard Time.

This remote video deposition is being held in the matter of the Terrorist Attacks on September 11th, 2001. Our deponent today is Chas W. Freeman.

All parties to this deposition are appearing remotely and have agreed to the witness

1 being sworn in remotely.

2 Due to the nature of remote
3 reporting, please pause briefly
4 before speaking so that all
5 parties are heard completely.

6 Counsel will be noted on the
7 stenographic record. The court
8 reporter today is Amanda Miller,
9 who will now swear in our witness.

10 - - -

11 CHAS W. FREEMAN, JR., after
12 having been duly sworn, was
13 examined and testified as follows:

14 - - -

15 VIDEO TECHNICIAN: Please
16 begin.

17 - - -

18 EXAMINATION

19 - - -

20 BY MR. HAEFELE:

21 Q. Thank you. Good morning.

22 Can you just -- I guess for
23 the record, can you just give us your
24 full name, please?

1 A. They are documents I read
2 after writing my report.

3 Q. Okay. If you had to
4 estimate the number of documents that you
5 read in preparation for your deposition,
6 what would that volume be?

7 A. I really don't know. I
8 mean, I don't count documents. I'm not
9 testifying on the basis of documents.

10 Q. Well, was it more than ten
11 or less than ten?

12 MR. GOETZ: Objection.
13 Form.

14 MR. HAEFELE: You can
15 answer.

16 THE WITNESS: I really don't
17 know.

18 BY MR. HAEFELE:

19 Q. So it could have been less
20 than ten?

21 A. It could have been.

22 Q. When counsel for WAMY sent
23 along the report that's attributed to
24 you, they also sent a document that was

1 last sentence there, Jon.

2 All right.

3 BY MR. HAEFELE:

4 Q. The sentence that's
5 highlighted on the screen is, He is also
6 the president of the Middle East Policy
7 Council, which requires regular trips to
8 the Persian Gulf for fundraising. While
9 there, he meets with many senior Saudi
10 officials.

11 Do you see that, sir?

12 A. That's right.

13 Q. And that's an accurate
14 statement?

15 A. Yes.

16 Q. And at the time, you were
17 identifying to the 9/11 Commission
18 investigators that the Saudi Alliance --
19 that you were then the Middle East Policy
20 Council president?

21 A. I was.

22 Q. How often did you go to the
23 Middle East for fundraising trips?

24 MR. GOETZ: Objection.

1 Form.

2 MR. HAEFELE: You can
3 answer.

4 THE WITNESS: Several times
5 a year. The organization, the
6 Middle East Policy Council, lived
7 very much hand to mouth. The
8 purpose of my trips was mainly to
9 meet with individuals in the Saudi
10 private sector, as well as
11 American company officials, who
12 saw the value of the Middle East
13 Policy Council's work and,
14 therefore, encouraged their
15 headquarters in the United States
16 to provide funding.

17 BY MR. HAEFELE:

18 Q. Who are the senior Saudi
19 officials who took your meetings during
20 these fundraising trips that you
21 referenced in the -- to the 9/11
22 Commission investigators?

23 A. Typically, I would see the
24 King, the Crown Prince, the Minister of

1 Interior, the Foreign Minister or his
2 Deputy, the Chief of the Istikhbarat,
3 which is the foreign intelligence
4 organization of Saudi Arabia. I might
5 also see the Minister of Petroleum and
6 Minerals. All of whom are personal
7 friends.

8 Q. The King, the Crown Prince,
9 the Minister of Interior, the Foreign
10 Minister, the Chief of Foreign
11 Intelligence.

12 Are they all members of the
13 Saudi Royal Family?

14 A. Yes.

15 Q. Was the Minister of
16 Petroleum and Minerals also a member of
17 the Royal Family?

18 A. No, not at that time.

19 Q. Is he now?

20 A. Yes.

21 Q. When you went and did your
22 fundraising trips, were most of your
23 meetings with members of the Saudi Royal
24 Family -- most of your meetings in the

1 Kingdom of Saudi Arabia related to the
2 Saudi fundraising, were they mostly
3 members of the Saudi Royal Family?

4 A. The meetings that the
5 Saudi -- members of the Saudi Royal
6 Family were not, for the most part,
7 related to fundraising.

8 They were discussions of
9 regional issues during which I attempted
10 to ascertain their view of those issues
11 and how they evaluated the view of the
12 United States and our activities.

13 Q. So when I asked you about
14 who you met with for fundraising, you
15 referenced the King, the Crown Prince,
16 the Foreign Minister, the Chief of
17 Intelligence and the Minister of
18 Petroleum and Minerals.

19 Was that an error? They
20 were not the folks you met with on
21 fundraising trips?

22 A. Fundraising was not the
23 purpose of any of those meetings.

24 Q. All right. So is it your

1 testimony that you did not meet Saudi
2 Royal Family members for fundraising?

3 A. I did not go in and ask for
4 anything. That is correct.

5 Q. Well, as a result of your
6 meetings, did your -- end of your
7 meetings result in fundraising, raising
8 funds?

9 A. On occasion --
10 MR. GOETZ: Objection to
11 form.

12 BY MR. HAEFELE:

13 Q. How frequently of an
14 occasion?

15 A. On two occasions the Crown
16 Prince, after the meetings, sent a
17 representative to ask me if there was any
18 way he could be of help. And I said, is
19 he asking whether he wants to help me or
20 the organization?

21 And he said, they said he
22 wants to help you.

23 And I said, I do not want
24 help, but I would appreciate a gift to

1 the Middle East Policy Council.

2 On two occasions there were
3 gifts from the Crown Prince.

4 Q. You had indicated that the
5 Middle East Policy Council was, I think
6 you said -- I can't remember how you
7 framed it. But you phrased it something
8 along the lines of that it was living
9 hand to mouth or something like that.

10 Was it a tight budget, is
11 that what you were saying?

12 A. Very tight budget.

13 Q. And so were the donations
14 from the Saudis an important aspect of
15 keeping the entity moving along?

16 A. Yes.

17 Q. You are currently the
18 president emeritus of the Middle East
19 Policy Council; is that right?

20 A. They have conferred that
21 title on me without asking me. I have
22 not objected.

23 Q. Do you do any activities
24 related to the Middle East Policy Council

1 Q. And is that the only two
2 instances of donations from the Middle
3 East that you recall -- I'm sorry, from
4 the Kingdom of Saudi Arabia?

5 A. It was a personal
6 contribution by the Crown Prince.

7 Q. And are those the only two
8 instances of Saudi Royal Family members
9 donating money to the Middle East Policy
10 Council that you recall?

11 A. Yes.

12 Q. Might there have been other
13 instances?

14 A. I don't recall any, no.

15 Q. And who was the principal
16 fundraiser during the time period that
17 you were the president of Middle East
18 Policy Council?

19 A. I was.

20 Q. And you made -- according to
21 your statements to the 9/11 Commission,
22 you made numerous trips to the Middle
23 East to speak to Saudi royals, correct?

24 A. I made numerous trips to

1 Q. And do you see where it
2 references that Prince Alwaleed was
3 considering a donation of \$7 million as
4 an endowment to the MEPC?

5 A. Yes, I see it.

6 Q. Do you recall discussing, in
7 or around that time period, a donation of
8 \$7 million toward an endowment?

9 A. I don't recall a figure of
10 \$7 million.

11 Q. Do you recall that there was
12 a discussion for an endowment of a large
13 sum of money toward the MEPC from Prince
14 Alwaleed?

15 A. There was a discussion, and
16 there was no money.

17 Q. Did you receive a donation
18 from Prince Alwaleed for a large sum of
19 money during that time period?

20 A. Not for the endowment.

21 Q. The memo also references an
22 additional donation of 1 million from
23 Crown Prince Abdullah.

24 Do you recall that in 2005?

1 A. Yes, I do.

2 Q. And did that happen?

3 A. I've already mentioned that
4 it's after I left the meeting with the
5 Crown Prince that one of his staff
6 approached me and said he wished to help
7 me.

8 And I said, well, I don't
9 need anything.

10 He said, no, no, he's
11 insistent.

12 I said, I don't want
13 anything for myself, I would like -- I
14 would welcome a contribution to the
15 Middle East Policy Council.

16 I returned to my hotel.
17 About 1 o'clock in the morning there was
18 a knock on the door. It was somebody
19 from the Royal Diwan who handed me a
20 check for \$1 million and asked that I sit
21 down and write a thank you note
22 acknowledging receipt of the check, which
23 I did.

24 Q. And this was in addition to

1 the \$250,000 donation from the Crown
2 Prince that we referenced earlier,
3 correct?

4 MR. GOETZ: Objection.
5 Form.

6 THE WITNESS: Entirely
7 separate.

8 BY MR. HAEFELE:

9 Q. Entirely separate, you said?

10 A. Yes.

11 Q. The memo also references an
12 additional donation of \$300,000 to the
13 MEPC from consultant.

14 Do you recall that donation?

15 A. Yes, it was never provided.

16 Q. And the memo also references
17 your meeting with the Saudi minister of
18 culture and information.

19 Do you recall meeting with
20 him to discuss support for the MEPC?

21 A. Where is that? Okay. At
22 the bottom.

23 Yes, I did have a meeting.

24 Q. And it says that he was

1 wealthy individuals throughout the
2 Arabian Gulf and, indeed,
3 occasionally elsewhere, as well as
4 with CEOs, CFOs and other
5 officials of American corporations
6 doing business in the region.

7 BY MR. HAEFELE:

8 Q. Were meetings of this
9 nature, with Saudi officials, something
10 that were common for you while you were
11 the president of the Middle East Policy
12 Council?

13 MR. GOETZ: Objection.
14 Form.

15 THE WITNESS: Irregular.

16 BY MR. HAEFELE:

17 Q. It's not something that you
18 did on a regular basis?

19 MR. GOETZ: Objection.
20 Form. Repetitive.

21 THE WITNESS: When I
22 traveled to Saudi Arabia, I tried
23 to maximize the receipt of
24 donations from individuals and

1 from interested agencies of the
2 government.

3 BY MR. HAEFELE:

4 Q. And were the meetings that
5 are described in the memo that went from
6 Mr. Roth to Mr. Rihani something that
7 happened on a regular basis?

8 MR. GOETZ: Objection.
9 Form.

10 THE WITNESS: These were
11 specific meetings.

12 BY MR. HAEFELE:

13 Q. Did you regularly meet with
14 Saudi officials --

15 MR. GOETZ: Objection.

16 BY MR. HAEFELE:

17 Q. -- while you were the Middle
18 East Policy Council president?

19 MR. GOETZ: Objection.
20 Form.

21 THE WITNESS: Yes.

22 BY MR. HAEFELE:

23 Q. And did you regularly have
24 meetings where you requested donations

1 that conference series?

2 A. I remember the conference
3 series. I don't have any specific memory
4 of that conference.

5 Q. In that 2005 time period,
6 you reported that due to the generosity
7 of Crown Prince Abdullah -- who was then
8 Crown Prince, but later became King --
9 the Middle East Policy Council had
10 markedly improved its financial position.

11 Do you recall making a
12 statement such as that?

13 A. Yes.

14 Q. And do you know why you
15 would have made a statement like that?

16 A. We had just received a \$1
17 million contribution to an endowment, the
18 purpose of which was to enable the
19 Council to go out of business if it was
20 unable to obtain sufficient donations to
21 continue.

22 Q. All right. And in 2007 you
23 met with Prince Alwaleed bin Talal al
24 Saud and received a donation for another

1 \$1 million for the Middle East Policy
2 Council; isn't that right?

3 A. I don't remember the amount.
4 But, yes, I met with Alwaleed on numerous
5 occasions.

6 Q. And Prince Alwaleed is also
7 a member of the Saudi Royal Family,
8 right?

9 A. Yes.

10 Q. And at the time, in that
11 time period, Prince Alwaleed was not only
12 a member of the Saudi Royal Family but he
13 was also one of the richest men on the
14 planet, right?

15 A. He is indeed one of the
16 richest men on the planet, has spent some
17 time imprisoned at the Ritz-Carlton in
18 Riyadh.

19 Q. Do you know why he spent
20 time in the Ritz-Carlton?

21 A. It was a financial
22 shakedown, I believe.

23 Q. The Kingdom Holding Company
24 is -- is or was a large Riyadh-based

1 there was approximately \$3 million in the
2 endowment. There is considerably less
3 now, I understand.

4 Q. All right. And when did the
5 endowment occur?

6 A. It was built over the 12
7 years that I served as president, having
8 agreed to serve for five.

9 Q. And you talked about -- I'm
10 sorry, what?

11 We had talked about there
12 being several -- a number of
13 millionaire -- multimillion-dollar
14 donations from some of the Saudis.

15 Did that contribute to the
16 endowment?

17 A. In the case of the Crown
18 Prince's two contributions, both were for
19 the endowment.

20 Q. You also spoke earlier today
21 about when you had been approached by one
22 of the Saudi officials on behalf of, I
23 think it was one of the Princes with a
24 check, offering you a check for \$1

1 million.

2 Do you remember that?

3 A. That was the Crown Prince's
4 representative in 2005.

5 Q. And who was -- and who was
6 the Crown Prince's representative that
7 approached you?

8 A. I don't know. Somebody from
9 the Royal Diwan.

10 Q. And can you recount for me
11 how that approach went? You said he came
12 to your hotel.

13 A. I was staying in the
14 Intercontinental Hotel. I had had a very
15 pleasant meeting with my friend, the
16 Crown Prince. He asked me indirectly,
17 through a courtier, after I left the
18 meeting, whether there was something he
19 could do for me.

20 I said no.

21 And he said, well -- the
22 courtier said, the Crown Prince would
23 like to do something.

24 I said, well, if he wants to

1 make a contribution to the Middle East
2 Policy Council, I would appreciate that.

3 I heard nothing until 1
4 o'clock in the morning when there was a
5 knock on my door. And since it was
6 Riyadh, I knew it wasn't a hooker, and I
7 opened the door.

8 And it was somebody from the
9 Royal Diwan who had with him a check for
10 \$1 million.

11 Q. And when you were offered if
12 there was anything that they could do for
13 you personally, did you understand that
14 to be that they were offering you some
15 financial remuneration personally?

16 A. Yes. And I never took a
17 cent from Saudi Arabia personally.

18 Q. And was that the first time,
19 last time, the only time, multiple times,
20 other than that, that you've been offered
21 financial remunerations personally?

22 A. In the Arab Gulf, it is
23 customary for people of great wealth to
24 make gifts. I never accepted a gift.

1 A. The stated reason was that I
2 was highly regarded in the region and
3 that I was also regarded as effective in
4 running meetings of the sort that the
5 Middle East Policy Council sponsored on
6 Capitol Hill.

7 MR. HAEFELE: If you could
8 flip to the third page of this
9 document, Jon, please.

10 BY MR. HAEFELE:

11 Q. Do you see that the year
12 that you arrived at Middle East Policy
13 Council, in 1997, that the -- Saudi
14 Arabia donated 5 -- I'm sorry -- \$564,210
15 to the Middle East Policy Council?

16 Do you see that?

17 A. I see that document. I have
18 no familiarity with this document. And
19 it relates to a period before I was
20 president of the Middle East Policy
21 Council.

22 Q. Do you see that the Saudi
23 Binladin Group donated \$50,000 in that
24 year?

1 A. Yes, I see that on the
2 document.

3 Q. Yes. Sure.

4 Do you see that -- and is
5 that consistent with the low end of what
6 the Saudi Binladin Group donated to the
7 Middle East Policy Council during the
8 time period you were there?

9 A. Yes.

10 Q. So they were donating 50 or
11 \$100,000 while you were there, correct?

12 A. Yes.

13 Q. And the Council of Saudi
14 Chambers of Commerce donated \$25,000
15 under the name of Saleh al Harthy, right?

16 Do you see that on the, one,
17 two, three, four, five, sixth item down?

18 A. I see -- I see that entry in
19 the document with --

20 Q. And we've already seen,
21 during your tenure, they donated, at
22 times, \$100,000 or so; is that correct?

23 A. They were an aggregator of
24 donations from the Saudi private sector.

1 Q. All right. And do you see
2 that the -- what's marked now as the
3 embassy of Saudi Arabia donated \$10,000?

4 Were you receiving donations
5 from the embassy of Saudi Arabia as well?

6 A. Intermittently.

7 Q. And there is a reference
8 here to a donaion from Abdullah bin
9 Abdulaziz al Saud.

10 Who is that?

11 A. Where is that?

12 Q. It's getting highlighted
13 right now.

14 A. That is the Crown Prince.

15 Q. And that's another \$250,000
16 that was donated by the Crown Prince to
17 Middle East Policy Council, correct?

18 A. I suppose. I don't -- I'm
19 not familiar with this document or what
20 he may or may not have donated prior to
21 my presidency.

22 Q. Do you know who Saeed Badeeb
23 is?

24 A. Yes.

1 Q. Who is that?

2 A. He was the deputy to Prince
3 Turki al Faisel, later the Saudi
4 Ambassador to the United States.

5 Q. And during the early --
6 during the mid 1990s, what position did
7 Prince Turki hold?

8 A. Prince Turki was in charge
9 of foreign intelligence.

10 Q. And is it your understanding
11 that donations that came -- did Prince
12 Turki donate to the Middle East Policy
13 Council during the time period you were
14 there?

15 A. Not directly, no.

16 Q. Did Saeed Badeeb donate
17 substantial sums to the Middle East
18 Policy Council while you were president?

19 A. I don't think --

20 MR. GOETZ: Objection to
21 form.

22 THE WITNESS: I don't think
23 he did, no.

24 BY MR. HAEFELE:

1 Q. All right. So in terms of
2 the charities' financial control over
3 their charitable receipts and what they
4 do with them, that's not something that's
5 within the purview of your expertise, I
6 take it?

7 A. The question of whether they
8 control where the donations end up is
9 very much within my purview.

10 The means by which they do
11 it and the consequences of an intense
12 dialogue between the U.S. Treasury and
13 the Saudi Ministry of Finance and the
14 Saudi Arabian monetary authority are not
15 within my purview.

16 Q. When was it that the Saudis
17 began to demonstrate the audits and
18 standards of accountability that you
19 referenced in the statement that you made
20 in the exhibit that's in front of you on
21 the screen?

22 A. Beginning in the late '90s.

23 Q. And what terrorist attacks
24 against the Saudis in the late 1990s

1 of which --

2 Q. And have you -- sorry, go
3 ahead.

4 A. All of which I read and
5 found them sound in scholarship and
6 lacking in what the Germans called
7 grundwahrheit, meaning ground truth. The
8 authors had never been to the Kingdom,
9 they were writing about a place they did
10 not know personally.

11 Q. And to the extent that you
12 relied upon those documents, are they
13 cited in your report, or did you omit
14 them from your report on purpose?

15 A. No, I'm -- no, I'm not
16 testifying from documents. I was asked
17 for a brief reading list, which I
18 provided.

19 Q. All right. So any document
20 that you're relying upon for any part of
21 your opinion is cited in your report,
22 correct?

23 A. My opinion does not depend
24 on documents. I cited it to corroborate

1 my opinion, not the other way around.

2 Q. How did you select what
3 materials you would include in your brief
4 reading list here?

5 A. These seemed to me to be the
6 most objective works on the Kingdom.
7 After 9/11, there was an avalanche of
8 polemic writing. Most of the books that
9 were produced are really not worth
10 reading. These are.

11 Q. How did you select the
12 materials that you would cite to in your
13 report? And -- well, how would you
14 select materials that you would cite in
15 your report to corroborate your opinions?

16 A. I wrote the report. And
17 then I looked online for things of which
18 I was already familiar or which addressed
19 the topic.

20 Q. And if you found something
21 that was contrary to your opinions, what
22 did you do with that?

23 A. I didn't find much that was
24 contrary to my opinions.

1 Q. I'm sorry, it sounds like
2 you would have used what?

3 A. To raise funds. The
4 Council -- the next sentence is
5 pertinent.

6 Q. All right. So you think you
7 would have attributed the Middle East
8 Policy Council as a friend to the Kingdom
9 of Saudi Arabia in the concept of asking
10 for money from them but not otherwise?

11 A. The purpose of the Council
12 was to present different views about the
13 Middle East, some of which I agreed with,
14 some of which I didn't agree with. I
15 think that was a service to the Kingdom
16 of Saudi Arabia and others in the region.
17 Helping --

18 Q. Was the Middle East -- was
19 the Middle East Policy Council one of
20 Saudi Arabia's most effective and
21 well-regarded friends in America?

22 A. I don't know that I would
23 put it that way except in a funding
24 solicitation.

1 Q. And the methodology you used
2 here to render your expert report was
3 based primarily on your personal
4 experience and knowledge having been an
5 Ambassador in the Kingdom?

6 A. My professional experience
7 dealing with this and related issues,
8 both in Saudi Arabia and in prior
9 incarnations, one of which I mentioned.

10 Q. And to the extent that you
11 relied on any documents for your opinion,
12 they are listed in your report, I take
13 it; is that fair?

14 A. I did not rely on documents.

15 Q. Okay. We talked about the
16 time when you were an Ambassador and some
17 issues came up with regard to the Muslim
18 World League, a Saudi charity.

19 And I think you met with Mr.
20 Naseef in Jeddah to discuss with him some
21 issues regarding the diversion of funds
22 to support a terror group that came out
23 of a mosque in Birmingham, something to
24 that effect.

1 Q. Ambassador Freeman, I just
2 have a few closing questions. And Mr.
3 Maloney is done with you for the day.

4 You -- and I'll just remind
5 you you're still under oath.

6 You wrote your report and
7 then you sought information to confirm
8 what you wrote; is that the way you
9 approached how you wrote your report?

10 A. Not exactly. I wrote the
11 report and then I looked for references
12 that would corroborate what I knew. That
13 is correct.

14 Q. All right. And did you even
15 consider any references to information
16 that didn't corroborate what you wrote?

17 A. Of course. In the course of
18 doing the research, looking for the
19 corroboration, I came across all sorts of
20 opinions. I did not find any effectively
21 refuting my views.

22 Q. You spoke about the event at
23 the Birmingham mosque.

24 Do you remember what year it

1 Q. The U.S. intelligence
2 report?

3 A. Yes.

4 Q. And do you concur with its
5 findings and conclusions, to the best of
6 your knowledge?

7 A. Yes, it seems to me to be
8 entirely reasonable.

9 Q. And so accepting, you have
10 to essentially agree and believe that
11 Crown Prince Mohamed bin Salman lied to
12 the world when he said he didn't know
13 anything about the murder of Khashoggi,
14 true?

15 A. Yes.

16 MR. MALONEY: I have nothing
17 further. Thank you.

18 MR. GOETZ: All right.
19 That's it.

20 VIDEO TECHNICIAN: This ends
21 today's deposition. We are going
22 to go off the record at 8:42 p.m.

23 - - -

24 (Whereupon, the deposition

1 concluded at 8:42 p.m.)

2 - - -

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

CERTIFICATE

I, Amanda Maslynsky-Miller, Certified Realtime Reporter, do hereby certify that prior to the commencement of the examination, CHAS W. FREEMAN, JR., was remotely sworn by me to testify to the truth, the whole truth and nothing but the truth.

I DO FURTHER CERTIFY that the foregoing is a verbatim transcript of the testimony as taken stenographically by me at the time, place and on the date hereinbefore set forth, to the best of my ability.

I DO FURTHER CERTIFY that I am neither a relative nor employee nor attorney nor counsel of any of the parties to this action, and that I am neither a relative nor employee of such attorney or counsel, and that I am not financially interested in the action.

Amanda Miller
Certified Realtime Reporter
Dated: April 18, 2021

(The foregoing certification of this transcript does not apply to any reproduction of the same by any means, unless under the direct control and/or supervision of the certifying reporter.)

1 INSTRUCTIONS TO WITNESS

2
3 Please read your deposition
4 over carefully and make any necessary
5 corrections. You should state the reason
6 in the appropriate space on the errata
7 sheet for any corrections that are made.

8 After doing so, please sign
9 the errata sheet and date it.

10 You are signing same subject
11 to the changes you have noted on the
12 errata sheet, which will be attached to
13 your deposition.

14 It is imperative that you
15 return the original errata sheet to the
16 deposing attorney within sixty (60) days
17 of receipt of the deposition transcript
18 by you. If you fail to do so, the
19 deposition transcript may be deemed to be
20 accurate and may be used in court.

1

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

- - - - -
E R R A T A
- - - - -

PAGE	LINE	CHANGE / REASON
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____

ACKNOWLEDGMENT OF DEPONENT

I, _____, do
hereby certify that I have read the
foregoing pages, 1 - 511, and that the
same is a correct transcription of the
answers given by me to the questions
therein propounded, except for the
corrections or changes in form or
substance, if any, noted in the attached
Errata Sheet.

CHAS W. FREEMAN, JR.

DATE

Subscribed and sworn
to before me this
_____ day of _____, 20____.

My commission expires: _____

Notary Public

This Transcript Contains Confidential Material

	LAWYER'S NOTES		
	PAGE	LINE	
1			
2			
3			
4			
5			
6			
7			
8			
9			
10			
11			
12			
13			
14			
15			
16			
17			
18			
19			
20			
21			
22			
23			
24			